# Attachment Exhibit No. 9G

# Richmond Times-Dispatch

**Advertising Affidavit** 

**Account Number** 

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300 E. Franklin Street Richmond, Virginia 23219 (804) 649-6208

Date

July 22, 2018

**ENVIRONMENTAL CONSULTING &** TECHNOLOGY 7208 FALLS OF NEUSE RD., SUITE 102 RALEIGH, NC 27615-3244

Date	Category	Description	Ad Size	Total Cost
07/22/2016	Legal Notices	C4GT, LLC, of Novi, Michigan has sub	omitted a Prevention of Si 2 x 27 L	182.00

C4GT, LLC, of Novi, Michigan has submitted a Prevention of Significant Deterioration (PSD) air permit application to construct a proposed nominal 1,865 MW natural gas fired combined cycle electric generating facility in accordance with the requirements of the PSD regulations contained in 9 VAC S, Chapter 80, Article 8, of the Commonwealth of Virginia Regulations for the Control and Abatement of Air Pollution for 80x, PMIO, PAUS, VOC, CO, sulfuric acid mist, and Greenhouse Gases. The proposed C4GT power generating facility will be located near the intersection of Sate Route 106 and State Route 685 in Charles City County, Virtinia.

CAGT will consist of two combustion turbine generating units and a steam turbine generating unit that utilizes the energy from the combustion turbines' waste heat which maximizes power generation while miximizing air emissions. Low-NOx combustors and Selective Catalytic Reduction systems will control NOx emissions. CO and VOC emissions will be controlled by the use of an oxidation catalyst. SO2. PAA, and sulfuric acid mist emissions will be minimized through the use of natural gas as a fuel. Creenhouse Gases will be minimized through the use of energy efficiency designs, practices, and procedures for the proposed facility. The facility will not be a major source of hazardous air pollutants.

An Informational briefing to Inform all interested parties about the PSO permit application will be held on August 30, 2016 at 7,009M at the Charles City Government School Board Administration Building located at 10900 Courthouse Road, Charles City, Virginia, 2000. For Intriber information, please contact George Hass of C46T, LLC at (248) 735-6684.

### Publisher of the **Richmond Times-Dispatch**

This is to certify that the attached C4GT, LLC, of Novi, Michi was published by the Richmond Times-Dispatch, Inc. in the City of Richmond, State of Virginia, on the following dates:

07/22/2016

The First insertion being given ... 07/22/2016

Newspaper reference: 0000358332

Sworn to and subscribed before me this

**Notary Public** 

Supervisor

State of Virginia

City of Richmond

My Commission expires

Jeanette F Whitaker NOTARY PUBLIC Commonwealth of Virginia 224072

y Commission Expr. June 30, 2017

# Attachment Exhibit No. 10

# Generation Interconnection Feasibility Study Report

# For

# PJM Generation Interconnection Request Queue Position AB2-068

Chickahominy 500kV 1060MW Capacity / 1060MW Energy

### Introduction

This Feasibility Study has been prepared in accordance with the PJM Open Access Transmission Tariff, 36.2, as well as the Feasibility Study Agreement between C4GT LLC, the Interconnection Customer (IC), and PJM Interconnection, LLC (PJM), Transmission Provider (TP). The Interconnected Transmission Owner (ITO) is Virginia Electric and Power Company (VEPCO).

### **Preface**

The intent of the Feasibility Study is to determine a plan, with high level estimated cost and construction time estimates, to connect the subject generation to the PJM network at a location specified by the IC. The IC may request the interconnection of generation as a capacity resource or as an energy-only resource. As a requirement for interconnection, the IC may be responsible for the cost of constructing: (1) Direct Connections, which are new facilities and/or facilities upgrades needed to connect the generator to the PJM network, and (2) Network Upgrades, which are facility additions, or upgrades to existing facilities, that are needed to maintain the reliability of the PJM system.

In some instances a generator interconnection may not be responsible for 100% of the identified network upgrade cost because other transmission network uses, e.g. another generation interconnection, may also contribute to the need for the same network reinforcement. The possibility of sharing the reinforcement costs with other projects may be identified in the Feasibility Study, but the actual allocation will be deferred until the Impact Study is performed.

The Feasibility Study estimates do not include the feasibility, cost, or time required to obtain property rights and permits for construction of the required facilities. The IC is responsible for the right of way, real estate, and construction permit issues. For properties currently owned by ITO, the costs may be included in the study.

### General

The IC has proposed a natural gas combined cycle generating facility located in Charles City, VA. The installed facilities will have a total capability of 1060 MW with 1060 MW of this output being recognized by PJM as capacity. The proposed in-service date for this project is 3/31/2020. This study does not imply an ITO commitment to this in-service date.

### **Point of Interconnection**

AB2-068 will interconnect with the ITO transmission system at one of the following points of interconnection:

Option 1 will connect via a new three breaker ring bus switching station that connects at the Chickahominy 500kV substation.

Option 2 will connect via a new three breaker ring bus switching station that connects at the Chickahominy 230kV substation open bay.

### Cost Summary

The AB2-068 project will be responsible for the following costs:

Description	<b>Total Cost</b>
Attachment Facilities	\$4,200,000
Direct Connection Network Upgrades	\$6,500,000
Non Direct Connection Network Upgrades	tbd
Total Costs	\$10,700,000

### **Attachment Facilities**

Generation Substation: Install metering and associated protection equipment. Estimated Cost \$700,000.

<u>Transmission:</u> Construct approximately one mile of 500 kV Attachment line between the generation substation and the existing Chickahominy 500 kV Substation. The estimated cost for this work is \$3,500,000.

The estimated total cost of the Attachment Facilities is \$4,200,000. It is estimated to take 24-30 months to complete this work. These costs do not include CIAC Tax Gross-up. The single line is shown below in Attachment 1.

### **Direct Connection Cost Estimate**

<u>Substation</u>: Add three new 500 kV breakers and associated equipment to the exiting Chickahominy 500 kV Substation (interconnection substation). The estimated cost of this work scope is \$6,500,000. Estimated time to complete this work is 30-36 months.

### **Non-Direct Connection Cost Estimate**

Remote Terminal Work: During the Facilities Study, ITO's System Protection Engineering Department will review transmission line protection as well as anti-islanding required to accommodate the new generation and interconnection substation. System Protection Engineering will determine the minimal acceptable protection requirements to reliably interconnect the proposed generating facility with the transmission system. The review is based on maintaining system reliability by reviewing ITO's protection requirements with the known transmission system configuration which includes generating facilities in the area. This review may determine that transmission line protection and communication upgrades are required at remote substations.

## Interconnection Customer Requirements

ITO's Facility Connection Requirements as posted on PJM's website <a href="http://www.pjm.com/~/media/planning/plan-standards/private-dominion/facility-connection-requirements1.ashx">http://www.pjm.com/~/media/planning/plan-standards/private-dominion/facility-connection-requirements1.ashx</a>

An Interconnection Customer entering the New Services Queue on or after October 1, 2012 with a proposed new Customer Facility that has a Maximum Facility Output equal to or greater than 100 MW shall install and maintain, at its expense, phasor measurement units (PMUs). See Section 8.5.3 of Appendix 2 to the Interconnection Service Agreement as well as section 4.3 of PJM Manual 14D for additional information.

## Revenue Metering and SCADA Requirements

### PJM Requirements

The IC will be required to install equipment necessary to provide Revenue Metering (KWH, KVARH) and real time data (KW, KVAR) for IC's generating Resource. See PJM Manuals M-01 and M-14D, and PJM Tariff Sections 24.1 and 24.2.

### **Option One**

### **Network Impacts**

The Queue Project AB2-068 was evaluated as a 1060.0 MW (Capacity 1060.0 MW) injection at the Chickahominy 500kV substation in the ITO area. Project AB2-068 was evaluated for compliance with applicable reliability planning criteria (PJM, NERC, NERC Regional Reliability Councils, and Transmission Owners). Project AB2-068 was studied with a commercial probability of 53%. Potential network impacts were as follows:

### Summer Peak Analysis - 2020

### **Generator Deliverability**

(Single or N-1 contingencies for the Capacity portion only of the interconnection)

None

### **Multiple Facility Contingency**

(Double Circuit Tower Line contingencies were studied for the full energy output. The contingencies of Line with Failed Breaker and Bus Fault will be performed for the Impact Study.)

None

### **Short Circuit**

(Summary of impacted circuit breakers)

New circuit breakers found to be over-duty:

None

Contributions to previously identified circuit breakers found to be over-duty:

None

### Contribution to Previously Identified Overloads

(This project contributes to the following contingency overloads, i.e. "Network Impacts", identified for earlier generation or transmission interconnection projects in the PJM Queue)

None

### **Steady-State Voltage Requirements**

(Summary of the VAR requirements based upon the results of the steady-state voltage studies)

To be determined during Impact Study.

### Stability and Reactive Power Requirement for Low Voltage Ride Through

(Summary of the VAR requirements based upon the results of the dynamic studies)

To be determined during Impact Study.

### **New System Reinforcements**

(Upgrades required to mitigate reliability criteria violations, i.e. Network Impacts, initially caused by the addition of this project generation)

None

### Contribution to Previously Identified System Reinforcements

(Overloads initially caused by prior Queue positions with additional contribution to overloading by this project. This project may have a % allocation cost responsibility which will be calculated and reported for the Impact Study)

None

### Potential Congestion due to Local Energy Deliverability

P.JM also studied the delivery of the energy portion of this interconnection request. Any problems identified below are likely to result in operational restrictions to the project under study. The IC can proceed with network upgrades to eliminate the operational restriction at their discretion by submitting a Merchant Transmission Interconnection request.

Note: Only the most severely overloaded conditions are listed below. There is no guarantee of full delivery of energy for this project by fixing only the conditions listed in this section. With a Transmission Interconnection Request, a subsequent analysis will be performed which shall study all overload conditions associated with the overloaded element(s) identified.

Not applicable

### Light Load Analysis

Light Load Studies to be conducted during later study phases (as required by PJM Manual 14B).

### ITO Analysis

ITO assessed the impact of the proposed Queue Project #AB2-068 interconnection of a 1060.0 MW Energy (1060.0 MW Capacity) injection into the ITO's Transmission System, for compliance with NERC Reliability Criteria on ITO's Transmission System. The system was assessed using the summer 2020 RTEP case provided to ITO by PJM. When performing a generation analysis, ITO's main analysis will be load flow study results under single contingency (both normal and stressed system conditions). ITO Criteria considers a transmission facility overloaded if it exceeds 94% of its emergency rating under normal and stressed system conditions. A full listing of ITO's Planning Criteria and interconnection requirements can be found in the ITO's Facility Connection Requirements which are publicly available at: http://www.dom.com.

The results of these studies evaluate the system under a limited set of operating conditions and do not guarantee the full delivery of the capacity and associated energy of this proposed generation facility under all operating conditions. NERC Planning and Operating Reliability Criteria allow for the re-dispatch of generating units to resolve projected and actual deficiencies in real time and planning studies. Specifically NERC Category C Contingency Conditions (Bus Fault, Tower Line, N-1-1, and Stuck Breaker scenarios) allow for re-dispatch of generating units to resolve potential reliability deficiencies. For ITO's Planning Criteria the re-dispatch of generating units for these contingency conditions is allowed as long as the projected loading does not exceed 100% of a facility Load Dump Rating.

As part of its generation impact analysis, the ITO routinely evaluates the impact that a proposed new generation resource will have under maximum generation conditions, stress system conditions and import/export system conditions (greater than 20 MW). The results of these studies are discussed in more detail below.

Category B Analysis (Single Contingency):

- 1. System Normal No deficiencies identified
- 2. Critical System Condition (No Surry 230 kV Unit) No deficiencies identified.

Category C Analysis: (Multiple Facility Analysis)

- 1. Bus Fault No deficiencies identified
- 2. Line Stuck Breaker No deficiencies identified
- 3. Tower Line No deficiencies identified

Import/Export Analysis (Single Contingency) are tabulated in Table A and B below.

Table A: Import Study Results

	Import Study Results				
Area	Summer 2020	Summer 2020 with AB2-068	Limiting Element		
AEP	2000+	2000+	None		
APS	2000+	2000+	None		
CPL	2000+	2000+	None		
РЈМ	2000+	2000+	None		

Table B: Export Study Results

Export Study Results				
Area	Summer 2020	Summer 2020 with AB2-068	Limiting Element	
AEP	2000+	2000+	None	

APS	2000+	2000+	None
CPL	2000+	2000+	None
PJM	2000+	2000+	None

ITO's Planning Criteria indicates a need to have approximately 2000 MW of import and export capability. The results of these import and export studies indicate that the proposed interconnection will not impact ITO's import or export capability.

### **Affected System Analysis & Mitigation**

### **Duke, Progress & TVA Impacts:**

Duke Carolina, Progress, & TVA Impacts to be determined during later study phases (as applicable).

### **Option Two**

### **Network Impacts**

The Queue Project AB2-068 was evaluated as a 1060.0 MW (Capacity 1060.0 MW) injection at the Chickahominy 230kV substation in the ITO area. Project AB2-068 was evaluated for compliance with applicable reliability planning criteria (PJM, NERC, NERC Regional Reliability Councils, and Transmission Owners). Project AB2-068 was studied with a commercial probability of 53%. Potential network impacts were as follows:

### Summer Peak Analysis - 2020

### **Generator Deliverability**

(Single or N-1 contingencies for the Capacity portion only of the interconnection)

None

### **Multiple Facility Contingency**

(Double Circuit Tower Line contingencies were studied for the full energy output. The contingencies of Line with Failed Breaker and Bus Fault will be performed for the Impact Study.)

None

### **Short Circuit**

(Summary of impacted circuit breakers)

New circuit breakers found to be over-duty:

#	Area	Bus No.	Bus	Breaker	Rating Type	Duty Percent Without AB2-068	Duty Percent With AB2-068	Duty Percent Difference
1	DVP	1366	CHICKAHOMINY 230.kV	SC122	S	89.36	110.98	21.62
2	DVP	1366	CHICKAHOMINY 230.kV	205022	S	87.78	108.19	20.41
3	DVP	1366	CHICKAHOMINY 230.kV	209122	S	87.78	108.19	20.41
4	DVP	1366	CHICKAHOMINY 230.kV	210222-2	S	87.78	108.19	20.41
5	DVP	1366	CHICKAHOMINY 230.kV	28722	S	87.78	108.19	20.41
6	DVP	1366	CHICKAHOMINY 230.kV	H222	S	87.78	108.19	20.41

#	Area	Bus No.	Bus	Breaker	Rating Type	Duty Percent Without AB2-068	Duty Percent With AB2-068	Duty Percent Difference
6	DVP	1366	CHICKAHOMINY 230.kV	212922	S	86.17	106.52	20.35
7	DVP	1366	CHICKAHOMINY 230.kV	287T2129	S	86.17	106.52	20.35
8	DVP	1366	CHICKAHOMINY 230.kV	202422	S	85.41	105.73	20.32
9	DVP	1366	CHICKAHOMINY 230.kV	2024T2091	S	85.41	105.73	20.32
10	DVP	1366	CHICKAHOMINY 230.kV	2050T2075	S	82.54	102.83	20.28
11	DVP	1366	CHICKAHOMINY 230.kV	210222-3	S	82.19	102.34	20.15
12	DVP	1366	CHICKAHOMINY 230.kV	207522	S	81.06	101.07	20.02

Contributions to previously identified circuit breakers found to be over-duty:

None

### Contribution to Previously Identified Overloads

(This project contributes to the following contingency overloads, i.e. "Network Impacts", identified for earlier generation or transmission interconnection projects in the PJM Queue)

None

### **Steady-State Voltage Requirements**

(Summary of the VAR requirements based upon the results of the steady-state voltage studies)

To be determined during Impact Study.

### Stability and Reactive Power Requirement for Low Voltage Ride Through

(Summary of the VAR requirements based upon the results of the dynamic studies)

To be determined during Impact Study.

### **New System Reinforcements**

(Upgrades required to mitigate reliability criteria violations, i.e. Network Impacts, initially caused by the addition of this project generation)

Violation	Overloaded	i i	Network Upgrade	
#	Facility	Upgrade Description	Number	Upgrade Cost

Violation #	Overloaded Facility	Upgrade Description	Network Upgrade Number	Upgrade Cost
#1-12	CHICKAHOMINY 230.kV	Replace (12) twelve 230kV breakers with 63kA	Pending	\$3,600,000
		Total N	lew Network Upgrades	\$3,600,000

### Potential Congestion due to Local Energy Deliverability

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Not applicable

### **Light Load Analysis**

Light Load Studies to be conducted during later study phases (as required by PJM Manual 14B).

### ITO Analysis

ITO assessed the impact of the proposed Queue Project #AB2-068 interconnection of a 1060.0 MW Energy (1060.0 MW Capacity) injection into the ITO's Transmission System, for compliance with NERC Reliability Criteria on ITO's Transmission System. The system was assessed using the summer 2020 RTEP case provided to ITO by PJM. When performing a generation analysis, ITO's main analysis will be load flow study results under single contingency (both normal and stressed system conditions). ITO Criteria considers a transmission facility overloaded if it exceeds 94% of its emergency rating under normal and stressed system conditions. A full listing of ITO's Planning Criteria and interconnection requirements can be found in the ITO's Facility Connection Requirements which are publicly available at: http://www.dom.com.

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Table B: Export Study Results

Export Study Results				
Area	Summer 2020	Summer 2020 with AB2-068	Limiting Element	
AEP	2000+	2000+	None	
APS	2000+	2000+	None	
CPL	2000+	2000+	None	
PJM	2000+	2000+	None	

ITO's Planning Criteria indicates a need to have approximately 2000 MW of import and export capability. The results of these import and export studies indicate that the proposed interconnection will not impact ITO's import or export capability.

### Affected System Analysis & Mitigation

### **Duke, Progress & TVA Impacts:**

Duke Carolina, Progress, & TVA Impacts to be determined during later study phases (as applicable).

Attachment 1.

### System Configuration

